

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE HEBREW UNIVERSITY OF JERUSALEM,
YISSUM RESEARCH DEVELOPMENT
COMPANY OF THE HEBREW UNIVERSITY
OF JERUSALEM LTD., BEN-GURION
UNIVERSITY OF THE NEGEV, B.G. NEGEV
TECHNOLOGIES AND APPLICATIONS LTD.,
THE WEIZMANN INSTITUTE OF SCIENCE,
and BAR ILAN UNIVERSITY,

Defendants.

Adv. Pro. No. 21-01190 (CGM)

STIPULATION AND ORDER

WHEREAS, on September 27, 2021, Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-lll, substantively consolidated with the chapter 7 estate of

Bernard L. Madoff, by and through his undersigned counsel, filed a complaint commencing the above-captioned action (“Complaint”) against The Hebrew University of Jerusalem, Yissum Research Development Company of the Hebrew University of Jerusalem Ltd., Ben-Gurion University of the Negev, B.G. Negev Technologies and Applications Ltd., The Weizmann Institute of Science, and Bar Ilan University (together, “Defendants,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS counsel for the Trustee and undersigned counsel for the Defendants conferred regarding an enlargement of the Trustee’s memorandum of law in response to the Defendants’ motion to dismiss, Defendants’ reply date and related issues; now therefore:

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel, that:

1. The Defendants moved to dismiss the Trustee’s Complaint on February 10, 2022.
2. The Trustee shall respond to the motion to dismiss by June 15, 2022.
3. The Trustee shall be permitted to file an enlarged response to the motion to dismiss up to 66 pages.
4. Defendants shall file their reply by August 15, 2022.
5. The Defendants reserve the right to request a reasonable enlargement of the memorandum of law in reply to the Trustee’s response to the Defendants’ motion to dismiss.
6. The Parties shall seek oral argument on the motion at the Court’s convenience after all briefing is complete.
7. As previously stipulated, Counsel for the Defendants accepted service of the Complaint and the Defendants waive any defense in this action based on insufficiency of process or insufficiency of service of process.

8. Except as expressly set forth herein, the Trustee and Defendants reserve all rights, arguments, objections and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses, including, without limitation, challenges to personal jurisdiction or to the jurisdiction of this Court.

9. Nothing in this Stipulation is a waiver of the Parties' right to request a further extension of time, including defendants' right to request a reasonable extension of the August 15, 2022 deadline to file their reply.

10. A signed facsimile or electronic copy of this Stipulation shall be deemed an original.

[Signatures on following page]

Dated: June 10, 2022
New York, New York

By: /s/ Tracy L. Cole
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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7
Estate of Bernard L. Madoff*

SO ORDERED.

By: /s/ Emil A. Kleinhaus
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Attorneys for Defendants

Dated: June 13, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge